

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS**

DAO HEALTH,

Plaintiff,
v.

SHENZHEN LUTEJIANCHENG
TECHNOLOGY CO., LTD.,

Defendant.

Civil Action No. 1:23-cv-04885
Hon. Thomas M. Durkin

JOINT DISCOVERY SCHEDULE

Pursuant to the Court's Order (D.I. 15, D.I. 27), the parties' jointly submit the following discovery schedule based on the Court's Local Patent Rules:

<i>Event</i>	<i>Deadline</i>
LPR 1.3. Fact Discovery Opens	January 25, 2024
LPR 2.1. Initial Disclosures	January 25, 2024
LPR 2.2. Initial Infringement Contentions	February 8, 2024
LPR 2.3 & 2.4. Initial Non-Infringement, Invalidity, and Unenforceability Contentions and Document Production	February 22, 2023
LPR 2.5. Initial Response to Non-Infringement, Invalidity, and Unenforceability Contentions	March 7, 2024
LPR 3.1(a)(1). Identify Asserted Claims for Final Infringement Contentions	June 20, 2024
LPR 3.1(a)(2). Final Infringement Contentions	July 9, 2024
LPR 3.1(b) & 3.3. Final Invalidity and Unenforceability Contentions and Document Production	July 9, 2024
LPR 4.1(a). Exchange of Claim Construction Terms	July 25, 2024
LPR 4.1(b). Last Day to Meet and Confer on Claim Terms	August 1, 2024
LPR 3.2(a). Final Non-Infringement Contentions	August 8, 2024
LPR 3.2(b). Final Enforceability and Validity Contentions	August 8, 2024
LPR 1.3. Fact Discovery Closes	August 22, 2024
LPR. 4.2(a). Dao Health's Opening Claim Construction Brief	August 29, 2024
LPR. 4.2(b). Joint Appendix	August 29, 2024
LPR. 4.2(c). Root Technology's Responsive Claim Construction Brief	September 19, 2024
LPR. 4.2(d). Dao Health's Reply Claim Construction Brief	October 3, 2024

LPR. 4.2(f). Joint Claim Construction Chart	October 10, 2024
LPR. 4.3. Deadline for Claim Construction Hearing (if not ordered otherwise)	October 31, 2024
LPR 1.3. Fact Discovery May Resume if so Ordered	Upon claim construction ruling
LPR 3.6. Fact Discovery Relating to Advice of Counsel Begins	7 days after claim construction ruling
LPR 1.3. Resumed Fact Discovery Closes	42 days after claim construction ruling
LPR 5.1(b). Initial Expert Disclosures	28 days after claim construction ruling or the close of resumed discovery
LPR 5.1(c). Rebuttal Expert Disclosures	28 days after initial expert reports
LPR 5.2. Close of Expert Discovery	28 days after rebuttal expert reports

Date: December 5, 2023

Respectfully submitted,

By: /s/ Howard B. Rockman

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Shenzhen Lutejiacheng Technology Co., Ltd.

SO ORDERED, THIS 6th DAY OF DECEMBER, 2023



Hon. Thomas M. Durkin, U.S.D.J.